

ENVIRONMENTAL ASSESSMENT
AK-040-03-EA-003

Applicant:	Hugh Krank	Greg Acord
Case File No.:	Alaska Bush Adventures (AA-84078)	Acord Guide Service (AA-75981)
	Tonya Schlentner Denali West Lodge (AA-74522)	Mike Litzen Litzen Guide Service (AA-76645)
	George Palmer Alaska Trophy Hunts (AA-74602)	Ken Powers Alaska Outdoor Expeditions (AA-76689)
	Phillip Esai Silvertip Guide Service (AA-70130)	Gary Pogany Osprey Lodge (AA-70277)
	Robert Jones Jr./Rod Schuh R&R Guide Service (AA-75715)	Tom Shankster (AA-84187)
	Randy Triplett Nushagak Outfitters (AA-84077)	Jeff Pralle High Country Experience (AA-76759)
	Scott Mileur Mileur's Fair Chase Hunts (AA-76706)	Jerry Jacques Jacques Adventure Company (AA-70289)
	Steve Perrins The Perrins Rainy Pass Lodge LLC (AA-76683)	

Type of

Action:

Special Recreation Permits (commercial guiding/hunting)

Location:

The Proposed Action affects the BLM-administered lands within Game Management Units (GMU) 17, 19, and 21E as well as the Rohn River (Tatina) site. More specifically, the lands affected lie within the following Townships of the Seward Meridian:

T. 12 N., R. 32 W.	T. 23 N., R. 47 W.
T. 12 N., R. 33 W.	T. 23 N., R. 48 W.
T. 12 N., R. 34 W.	T. 23 N., R. 51 W.
T. 12 N., R. 35 W.	T. 24 N., R. 44 W.
T. 12 N., R. 36 W.	T. 24 N., R. 45 W.
T. 13 N., R. 33 W.	T. 24 N., R. 46 W.
T. 13 N., R. 34 W.	T. 24 N., R. 47 W.
T. 13 N., R. 35 W.	T. 24 N., R. 48 W.
T. 13 N., R. 36 W.	T. 25 N., R. 22 W.
T. 18 N., R. 54 W.	T. 26 N., R. 22 W.
T. 18 N., R. 55 W.	T. 27 N., R. 27 W.
T. 19 N., R. 50 W.	T. 27 N., R. 28 W.
T. 19 N., R. 51 W.	T. 27 N., R. 29 W.
T. 19 N., R. 52 W.	T. 28 N., R. 23 W.
T. 19 N., R. 54 W.	T. 28 N., R. 27 W.
T. 19 N., R. 55 W.	T. 28 N., R. 28 N.
T. 20 N., R. 45 W.	T. 28 N., R. 29 W.
T. 20 N., R. 49 W.	T. 29 N., R. 27 W.
T. 20 N., R. 50 W.	T. 29 N., R. 28 W.
T. 20 N., R. 51 W.	T. 30 N., R. 28 W.
T. 20 N., R. 52 W.	T. 31 N., R. 20 W.
T. 21 N., R. 50 W.	T. 32 N., R. 19 W.
T. 22 N., R. 46 W.	T. 32 N., R. 20 W.
T. 22 N., R. 47 W.	T. 32 N., R. 26 W.
T. 22 N., R. 48 W.	T. 33 N., R. 17 W.
T. 23 N., R. 45 W.	T. 34 N., R. 20 W.
T. 23 N., R. 46 W.	

USGS Quads 1:63000: McGrath A-1, B-1, B-2, B-3, C-1, C-2, D-1, D-3;
 Talketna C-6, D-5, D-6; Lime Hills A-6, A-7; Sleetmute A-1, C- 4, C-5, C-6, D-4,
 D-5, D-6; Iditarod A-3, A-4, A-5; Russian Mission C-1.

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Date: August 8, 2003

I. INTRODUCTION

This Proposed Action involves commercial guided use of public lands in Game Management Unit (GMU) 17, 19 and 21 including the Rohn River (Tatina) Site. GMU 19 consists of the Kuskokwim drainage upstream from Lower Kalskag River. The area is bordered on the east by the Alaska Range and Kuskokwim Highlands to the north. GMU 17 consists of the Nushagak, Mulchatna, and Togiak watersheds. These drainages are bordered on the north by the Nushagak Hills and on the south by Nushagak Bay. The west border of this unit is the Togiak watershed and the Ahklun Mountains. The east border consists of the Nushagak river watershed. Land ownership throughout this area varies. BLM is responsible for managing public lands including State and Native selected land until it is conveyed or relinquished. Along navigable streams, BLM maintains management authority only for those lands that are above the ordinary high water mark, and the State of Alaska manages land and waters below that mark. Non-navigable waters and lakes less than 50 acres are also managed by the BLM. For commercial big game hunting guides, authorization will be only for those lands that the operator is authorized to hunt on by the State of Alaska's Big Game Commercial Services Board.

Commercial activities associated with this environmental assessment at the Rohn River site include big game guiding, river float trips, and sight seeing. Primary uses for the site include put-in and take-out locations for raft trips and staging areas to access camps on nearby state land. All require the use of the airstrip to transport gear and individuals in and out of the field. Use of the Rohn cabin will not be permitted for commercial use.

A. Purpose and Need for the Proposed Action:

The Anchorage Field Office (AFO) has received fifteen applications from Hugh Krank, Greg Acord, Jack Hayden, Mike Litzen, George Palmer, Ken Powers, Phillip Esai, Gary Pogany, Rob Jones/Rod Schuh, Tom Shankster, Randy Triplett, Jeff Pralle, Scott Mileur, Jerry Jacques, and Steve Perrins to primarily conduct guided big game hunts on public land within GMU 17, 19 and 21E. Specific locations are described under the Proposed Action. The use of the Rohn (Tatina) site as a staging area to conduct guided big game hunts and float trips is also requested by a number of the above listed outfitters.

Other outfitters have shown interest or have operated in these three GMU's in the past. To date, fifteen have requested permits. BLM managed land in this area is widely dispersed and it is reasonable to assume additional outfitters will request authorization to guide in GMU 17, 19 and 21E and use the Rohn site and associated airstrip in the future.

This type of service is needed to meet the anticipated public demand for guided services that provide safe recreational opportunities in remote or relatively inaccessible locations in this area of Alaska.

B. Conformance With the Land Use Plan:

This action is in conformance with the Southwest Management Framework Plan (MFP) dated November 1981, activity objectives Wildlife (WL-4), Recreation (R-3), and Minerals (M-2). These decisions do not directly address special use permitting, but recognize that hunting, fishing, and trapping are legitimate uses of public land.

C. Relationship to Statutes, Regulations, Policies, Plans or Other Environmental Analyses:

A special recreation permit (SRP) is required for commercial recreation use including big game guiding on public land and water pursuant to 43 CFR 2930. With this regulation, an applicant may be authorized to conduct commercial recreation activities on BLM-administered land. The Authorized Officer may issue SRP's for up to five years subject to annual authorization. The permittee must satisfactorily meet the requirements associated with the SRP as well as conform with applicable laws and regulations on all other Federal or State administered lands and waters.

Permits from the State of Alaska are required for all services that derive revenue on State lands starting from the first day of occupancy. At a minimum, the applicants must have a State of Alaska, Guide Outfitter license to guide in GMU 17, 19 and 21E.

II. PROPOSED ACTION AND ALTERNATIVE

A. Proposed Action:

The applicants propose to conduct commercial big game guiding and/or guided hiking, float trips and sight seeing on public lands within GMU 17, 19 and 21E as well as the Rohn River site. A typical guided trip may last ten days and include a 1:1 or 1:2 guide to client ratio totaling 20 to 30 user days per trip. Standard SRP stipulations would apply to any authorization. Following are descriptions of the type and frequency of use for individual applicants.

Hugh Krank - Alaska Bush Adventures

Mr. Krank has applied to conduct guided fishing, sightseeing and black/brown bear, caribou, and moose hunting on BLM administered land in GMU 19 and 21E from June 1st to October 31st. He is licensed in GMU 6, 9, 17, 19, and 21E but has only applied for use of public lands in Guide Use Areas (GUA) 19-02, 19-03, and 21-01.

Mr. Krank has requested to set up a base camp which will be located on public land near the confluence of Iditarod River and Montana Creek (Section 4, T. 23 N., R. 51 W., SM). He expects to have between two and fifteen clients from June through October.

Base camp will consist of one wall tent and a number of geodesic self-standing tents depending on the number of clients. Mr. Krank has requested storage for camp equipment and a 14 ft. inflatable zodiac with 40 hp jet motor at the base camp location. Storage methods will be two 55 gallon drums and for the larger items, such as a boat and motor, he would like to cache them in the nearby trees out of sight and out of reach of bears. All equipment will be taken down at the end of each season.

No additional spike camps have been identified. A privy will be located approximately 200 ft. from the waters edge. Water from nearby streams will be used for cooking and drinking. Access and method of transportation into and within the field will be by chartered float or wheel plane, outboard boat or foot.

Greg Acord - Acord Guide Service

Mr. Acord has applied to conduct guided hunting for moose, caribou, brown and black bear in GUA 19-12 from August 1 to September 21. Base camp is located on the west shore of Scotty Lake, approximately five miles north of the Tonzona River and 3.5 miles south of the Denali National Park and Preserve (Section 28, T. 33 N., R. 17 W., SM). The maximum number of clients he will guide at one time is two and he doesn't expect to have more than four clients total.

Base camp will consist of one 10' x 12' wall tent and one 12' x 14' wall tent, as well as a pit privy located approximately 200 ft. from the waters edge. Temporary storage is requested for the tents and miscellaneous camp gear in the form of three lock top 50 gallon drums. The 50 gallon drums will be bear proof and stored out of site and secured to trees year round for the duration of the five year permit. Access to camp is by float plane and transportation in the field is by foot.

Tonya Schlentner - Denali West Lodge

Tonya Schlentner operates a lodge on the shore of Lake Minchumina. She offers guided day and multiple day hiking adventures along the northern foothills of the Alaska Range. Specifically, they use Scotty Lake (Section 28, T. 33 N., R. 17 W., SM) for chartered float plane access. Land surrounding Scotty Lake is managed by the BLM. Typically, the treks proceed south from Scotty Lake towards the foothills. There are no facilities, but they do not plan on trips lasting more than one day. The operating season is from June through August. They estimate no more than four people per trip.

Mike Litzen – Litzen Guide Service

Litzen Guide Service has applied to conduct guided big game hunts within GMU 19. He has been under a BLM SRP for big-game guiding since March 1993.

Hunting will take place in GUA 19-12 and will be primarily for moose. The expected number of clients each year is between two and four.

The base camp for this operation is on private property located in T. 33 N., R. 16 W., SM and is known as the Grandview Lodge. One spike camp is located on BLM administered land near the Little Tonzona River (62°44.695 N, 152°58.525 W) and will consist of a 10' x 12' wall tent with pole construction. The use of this camp will take place in the fall from September 1st through the 20th. No temporary storage of equipment is requested.

Access to camp is by Super Cub on wheels, which lands on a 500' gravel bar runway in front of camp. All travel in the field is on foot. Mr. Litzen also requests the use of the Rohn airstrip to use as a staging point. Use of the Rohn airstrip and surrounding area will be less than 24 hours.

George Palmer – Alaska Trophy Hunts

Mr. Palmer has applied to conduct guided black/brown bear, caribou, sheep, bison, wolf, wolverine, and moose hunting and to a lesser extent guided fishing and sightseeing on BLM administered land in GUA 19-12. Activities will take place between the South Fork of the Kuskokwim River and the southwest border of Denali National Park. Guided hunting will coincide with legal hunting seasons established for each species by the state of Alaska. His typical season will fall between August 10th through October 10th.

Mr. Palmer requests permission to set up four possible spike camps which will be located on public land all within the Talkeetna (D-6), Alaska quad. Specific locations include: Section 26, T. 33 N., R. 18 W., SM; Section 35, T. 32 N., R. 19 W., SM; Section 13, T. 31 N., R. 18 W., SM; and Section 25, T. 31 N., R. 20 W., SM. All camps will be removed at the end of the season. Base camp will be located on State land. He expects to have between two and fifteen clients during the season between June and October.

Hunting activities will take place on foot. All equipment will be taken down at the end of each season. No storage in the field is requested.

A privy will be located approximately 100 ft. from the waters edge and away from high traffic areas. Water from nearby streams will be used for cooking and drinking. Access and method of transportation into and within the field will be by float or wheel plane.

Ken Powers - Alaska Outdoor Expeditions Inc.

Mr. Powers has applied for use of BLM lands surrounding his base camp located on private property located within Section 4, T. 12 N., R. 32 W., SM.

Commercial services will be for guided hunting (bear, caribou), fishing, hiking, and possibly photography trips within GMU 19. The number of expected clients is estimated to be between six and eighteen.

Tent camps on BLM lands will be highly mobile and moved frequently. Thus, no accurate location can be given. Typically, tent camps are used for three to five days before returning to base camp. No fuel will be stored at tent camps. Access to base camp is by chartered float plane and all fuel storage and refueling will be done at the private land location. Hunting activities will take place on foot.

Phillip Esai – Silvertip Guide Service

Phillip Esai has applied to conduct guided big game hunts in GMU 19. This permit application is for big game guiding activities surrounding FLPMA lease site AA-64705, located at Section 25, T. 27 N., R. 27 W., SM. His season of operation usually takes place in March, May, August and September. Species hunted may include grizzly and black bear, wolf, Dall sheep, moose, caribou, bison, and wolverine. The maximum number of expected clients is 12.

The lease site will serve as base camp for guiding operations. A temporary tent camp on BLM managed lands is located at Section 5, T. 30 N., R. 28 W., SM. It consists of one 10' x 12' wall tent with a floor. An outhouse is located well over 100 ft. from any body of water. (See the available map in the case file.)

Access to the main camp is by wheeled aircraft at an airstrip located ¼ mile south of the main camp (N 62°23'48.4", W 154°13'21.6"). Access to the tent camp is on pre-existing roads and trails by snowmobile, ATV and foot.

Mr. Esai requests the continued use of the Windy Creek BLM cabin (62.7233° N, 154.0767° W) for his operation.

Gary Pogany

Mr. and Mrs. Pogany have applied to use BLM managed land surrounding their lodge which is located on private land (U.S. Survey 7025, Section 21, T. 12 N., R. 34 S., SM). They have been operating this lodge (base camp) for more than 25 years. The immediate surrounding lands are managed by the BLM, which are surrounded by Native lands and lands managed by the State of Alaska. His season of operation coincides with the season of the big game species hunted. The primary species hunted will be caribou in GMU 19. The caribou season typically begins in August and ends in April the next year. On rare occasions and if regulations allow, other species may be hunted including bear (black and brown), moose, and wolf.

Three temporary tent camps have been traditionally used in the past. Two are accessed by ATV (Sections 7 and 28, T. 12 N., R. 34 W., SM) and the other by wheeled aircraft (Section 25, T. 12 N., R. 35 W., SM). All of these camps are located on BLM lands. No fuel will be stored at the tent camp locations. Tent camps are usually set up a week in advance, depending on weather, and dismantled within 30 days.

Robert Jones, Jr./Rod Schuh – R&R Guide Service

R&R Guide Service has applied to conduct guided big game hunts within various locations of GMU 17 and 19 for all big game species. They also offer some fishing, adventure trips, and drop-off hunts on a very limited basis. They expect to have between 30 to 35 clients between March 1st and October 20th annually.

Base camp is located on private property located in the Big River drainage (Lat. N.61°54', Long. W.154° 24'). Temporary spike camps are requested, but would only be set up on an as needed basis for short times (less than 14 days). There are no set spike camp locations and no storage of equipment in the field is requested.

Access to the area will be by personal aircraft on wheels or floats. Transportation in the field is done on foot.

Tom Shankster – Shankster Inc.

Mr. Shankster has applied to conduct guided moose, sheep, grizzly and black bear, wolf, and caribou on State and BLM administered land in GUA 19-12, 19-10, and 19-06. The general time frame for guided hunts is August through October (fall season) and April through May (spring season). The estimated number of clients is six each year.

Base camp is located on State land in the Jones River drainage, Section 29, T. 27 N., R. 21 W., SM. Mr. Shankster also requests the use of the Rohn Airstrip to use as a staging point to ferry clients to his base camp. The time spent here is generally less than a few hours. Access to base camp is by wheeled aircraft and mode of transportation in the field will be aircraft or by foot.

Temporary spike camps are requested, but would only be set up on an as needed basis for short times (less than 14 days). There are no set spike camp locations and no storage of equipment in the field is requested.

Randy Triplett – Nushagak Outfitters

Mr. Triplett has applied for a SRP to guide big game hunters in GUA 17-02, 17-04, and 17-06. He operates out of his home in Dillingham in the spring for bear. In the summer and fall he operates out of his lodge on private land at the mouth of the Nushagak River and Koktuli River for caribou, moose, and bear.

The season of operation will typically be from April 15th to October 2nd. There are no set spike camp locations and no storage of equipment in the field is requested.

Jeff Pralle, High Country Experience

Mr. Pralle requests the use of the Rohn site for take-out only of float boats. Depending on weather conditions, clients may end up camping at the Rohn River site. Float trips will originate either on the Hartman River or Kuskokwim River and float out to the Rohn site for pick-up. The use will be from September 1st through 21st on an annual basis. Chartered aircraft will do all aircraft operations. No storage of equipment is requested.

Scott Mileur - Mileur's Guide Service

Mr. Mileur has applied for a SRP to use the Rohn airstrip as a staging area to transport people and camp equipment to his base camp on State land. All hunting activities will take place on State land.

Mr. Mileur has a permit through the State of Alaska to conduct guided hunting operations approximately one mile south of the Rohn airstrip on State land. The use of this site would be from mid-August to mid-September. The time spent here is generally less than a few hours.

Jerry Jacques

Mr. Jacques requests the use of the Rohn site for chartered aircraft landings and as a "put-in" or "take-out" location for hunters and recreational boaters who float down the South Fork of the Kuskokwim River. Float trips take place either from a location upriver of the Rohn River site or at the Rohn River site and end at a destination down river. Expected use would be from mid-August to mid-September. Estimated number of trips to put-in or take-out at the Rohn site is eight. No storage of equipment is requested.

Steve Perrins, The Perrins Rainy Pass Lodge LLC

Mr. Perrins has applied for a SRP to use the Rohn airstrip as a staging area to transport big game hunting clients to and from one of his spike camps located approximately seven miles up the Tatina River from the Rohn Airstrip. This spike camp is located on State land. From the Rohn site, up to four horses may be utilized to carry food and gear to his spike camp. Horses and hiking are the only modes of transportation in the field from the Rohn site. Temporary tent camps may be utilized at the Rohn airstrip prior to and after hunts. All trash and supplies will be flown out. No storage near the airstrip has been requested. All aircraft use will be chartered.

The use of this site would be from mid-August to mid-October. He plans on guiding four to ten clients during the season. Most, if not all, hunting will take place on State land within a ten mile radius of his spike camp.

B. No Action Alternative:

The No Action Alternative would be to not authorize the use of public land to conduct commercial big game guiding on BLM administered land.

III. **AFFECTED ENVIRONMENT**

A. Critical Elements

It has been determined that the following Critical Elements of the human environment are either not present or would not be affected by the Proposed Action or the No Action Alternative:

- Air Quality
- Areas of Critical Environmental Concern (ACECs)
- Environmental Justice (EJ)
- Farm Lands (prime or unique)
- Floodplains
- Invasive, non-native species
- Native American Religious Concerns
- Water Quality (Surface/Ground)
- Wetlands/Riparian
- Wild and Scenic Rivers
- Wilderness

1. Cultural Resources:

Numerous cultural sites occur within GMUs 17, 19 and 21 and the Tatina River area. None of the campsites are located on or near any of these cultural sites except for the activities scheduled for the Rohn Civilian Conservation Corps (CCC) Cabin (MCG-0019). The Rohn CCC Cabin is eligible to the National Register of Historic Places and currently and historically has been used as a shelter cabin.

2. T&E Species:

There are no Threatened or Endangered Species of animals known to occur in this region. There is no designated Critical Habitat for any Threatened or Endangered Species.

There are no rare or sensitive plant species known to occur in the area. There are several high interest plant species that may occur in this region.

3. Wastes, Hazardous and Solid:

There are no known wastes, hazardous or solid, at the sites of the camps.

4. Subsistence:

The availability, biological complexity, and harvest of fish and wildlife resources in a region as large as GMUs 17, 19, and 21E are extremely complex, dynamic, driven by regional as well as local conditions and issues, and subject to change. Currently low moose population levels in GMU 19 and user conflicts in 21E are complicated by variable harvest patterns, predation, and habitat productivity over a broad landscape. The Central Kuskokwim Moose Management Planning Committee and GASH Area Moose Management Planning Committees are currently working on solutions to shortages. Many of the recommendations from this group may eventually be incorporated into Federal and State Regulations that will limit bag limits, means of taking, open and closed areas to various user groups, and alter current periods of open hunting or fishing seasons.

B. Land Status:

The public lands that would be affected by the Proposed Action are selected and non-selected. Public lands which are Native or State selected continue to be managed by the BLM until conveyed. BLM is required to consult with these entities when an action being considered on selected land would encumber the title to the land, such as a long-term right-of-way with permanent facilities.

C. Wildlife:

Local, regional, and National issues and circumstances dictate management of wildlife populations in the region. Currently moose populations are at the lowest levels in recent history. Rapidly changing regulations from both Federal lands and the Federal Subsistence Program and the State management programs may contribute to wildlife populations fluctuating widely. Regulatory processes will attempt to maintain and manage harvests as well as viable populations. Current outfitter policy contributes to overcrowding, over harvest, and depletion of some wildlife populations used by all user groups.

IV. ENVIRONMENTAL CONSEQUENCES

A. Impacts of the Proposed Action:

1. Critical Elements:

a. Cultural Resources:

Cultural resources are known to occur within the GMUs, but the activities performed under this permit should have no impact upon them.

b. Wastes, Hazardous and Solid:

Potential for harm to the environment is presented by risks associated with spills of oil and/or hazardous substances, and

improper management of wastewater and trash generated by human activity at campsites.

Campsite activities will utilize fuel and other materials which contain oil and/or hazardous substances, such as batteries, oil/grease, pesticides (insect repellent). Human waste and wastewater will be generated by camp activities. Also non-hazardous solid waste (trash) will be generated.

c. Subsistence

Commercially guided hunting, fishing, and other pursuits can and do have potential impacts on Federal subsistence resources and subsistence harvest of such resources. The degree of impact may be as severe as total closure of Federal Public land areas managed by BLM to general hunting by Alaska residents or non residents for one or more species or exclusion of specific areas from such users. The dynamics of State and Federal management in this region may also force commercial outfitters out of areas heavily utilized by Federal and State subsistence users and into BLM areas that are more remote or less accessible thus adding to contemporary harvest pressure in those areas.

2. Wildlife:

There is some potential for encounters with brown bears drawn into hunting camps by the presence of animal carcasses. This may increase the chance of the taking of bears for the defense of life or property, when bears may not otherwise be taken.

B. Impacts of the No Action Alternative:

There is a potential loss of recreation opportunities for people desiring access to areas that are otherwise inaccessible to them. There would be no impacts to cultural or wildlife resources if commercial guiding use is not authorized.

C. Cumulative Impacts:

Because the applicants' actions on public lands are limited, localized, and expected to operate under special stipulations and conditions, it is not expected that there will be any long-term cumulative environmental impacts.

D. Mitigation Measures:

1. All wastes should be managed in accordance with State of Alaska and Federal laws and regulations. Pollution Prevention stipulations should be included with the Use Permit. Specifically, stipulations should address

proper management requirements for wastewater, hazardous and non-hazardous solid waste, and spill prevention and response.

2. Hunting camps should be kept clean of food and curing meat. Carcasses should be removed from the camp as soon as possible to avoid attracting bears to the site.

V. CONSULTATION AND COORDINATION

- A. Persons and Agencies Consulted:
David Kelley - Alaska Dept. of Natural Resources
Katie Gage - CIRI
- B. List of Preparers:
Dave Doucet - Recreation
Larry Beck - Environmental Protection Specialist
Donna Redding - Cultural, Historic, Paleontological
Jeff Denton - Subsistence, Wildlife
Bruce Seppi - Wildlife, T&E, Riparian
Debbie Blank - Vegetation
Jake Schlapfer - Recreation
Natalie Cooper - Lands/Realty